

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

CROSSCOUNTRY MORTGAGE, LLC,)	Case No. 1:22-cv-01378-CEF
)	
Plaintiff,)	Judge Charles Esque Fleming
)	
vs.)	
)	
IMPAC MORTGAGE HOLDINGS, INC.)	
and IMPAC MORTGAGE CORP.,)	
)	
Defendants.)	

Unopposed Motion for Extension of Time for Defendants to Respond to Complaint

Pursuant to Fed. R. Civ. P. 6(b) and Local Rule 7.1, defendants IMPAC Mortgage Holdings, Inc. and IMPAC Mortgage Corp. respectfully move for an extension of time of thirty (30) days to respond to the complaint filed by plaintiff.

Plaintiff filed the complaint in this action on August 4, 2022, and the complaint was served on defendants on August 9, 2022. (*See* ECF Doc. 3.) By rule, defendants' answer or other response to the complaint is currently due on or before August 30, 2022. Defendants thus seek an extension of time until September 29, 2022, to answer or otherwise respond to the complaint.

Counsel for plaintiff has been contacted and has consented to this request for a thirty-day extension.

This motion is being made for good cause and not for purposes of delay. Defendants request the additional time so that their counsel can have time to review the complaint and prepare Defendants' response to it, and also so that their primary counsel, located in California, can be admitted *pro hac vice*.

For the foregoing reasons, Defendants respectfully request that they be granted an extension of time until September 29, 2022, to answer or otherwise respond to the complaint in this action.

August 25, 2022

Respectfully submitted,

/s/ Jeffrey Saks
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*Counsel for Defendants IMPAC Mortgage
Holdings, Inc. and IMPAC Mortgage Corp.*

Local Rule 7.1(f) Certification and Certificate of Service

Pursuant to Local Rule 7.1(f), I hereby certify that this Unopposed Motion for Extension of Time for Defendants to Respond to Complaint adheres to the page limitations.

I also hereby certify that on August 25, 2022, a copy of the foregoing was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. Parties may access this filing through the Court's system.

/s/ Jeffrey Saks
Jeffrey Saks

*Counsel for Defendants IMPAC Mortgage
Holdings, Inc. and IMPAC Mortgage Corp.*